

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

_____	:	
ASHOT EGIAZARYAN	:	
	:	
v.	:	Case No. 1:11-cv-02670(PKC)GWG
	:	
PETER ZALMAYEV	:	
_____	:	

DECLARATION OF JAMES P. GOLDEN

JAMES P. GOLDEN, hereby declares under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am a shareholder in the firm of Hamburg & Golden, P.C., counsel for defendant Peter Zalmayev, and I submit this declaration in support of Mr. Zalmayev's motion to compel BGR documents from Mr. Egiazaryan.

2. The following true and correct exhibits are attached:

1. Mr. Egiazaryan's Reply Memorandum In Further Support Of Plaintiff's Motion To Enforce Compliance With This Court's January 20, 2012 Order, at p. 13, submitted to the United States District Court for the District of Columbia.
2. Mr. Cohen's October 26, 2012, email to Mr. Golden.
3. Magistrate Gorenstein's March 14, 2012, Order.
4. BGR Contract.

5. December 12, 2011, privilege log.
6. August 24, 2012, transcript.
7. Egiazaryan's October 1, 2012, Privilege Log
8. Egiazaryan's October 26, 2012, Privilege Log
9. Five examples of emails showing standard public relations work
10. Mr. Cohen's November 14, 2012, email to Ms. Silver
11. Mr. Cohen's November 15, 2012, email to Ms. Silver
12. History of Mr. Zalmayev's attempts to obtain documents from BGR.

/s/ James P. Golden

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Peter Zalmayev

Dated: November 28, 2012